

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13
:
Yvonne D. Kirkland : No. 22-11012-AMC
Debtor :

ANSWER TO MOTION OF U.S. BANK NATIONAL ASSOCIATION,
(TRUSTEE FOR THE PENNSYLVANIA HOUSING FINANCE AGENCY)
FOR RELIEF FROM THE AUTOMATIC STAY UNDER SECTION 362
AND CERTIFICATE OF SERVICE

1. Debtor made a mistake in failing to pay the mortgage and asks for a chance to get caught up by amending her plan.

WHEREFORE, Debtor respectfully requests this Honorable Court deny Movant's Motion for Relief.

/s/ David M. Offen
David M. Offen
Attorney for Debtor

Dated: 10/12/2022

A copy of this Answer is being served on Denise Carlon, Esquire, and the Chapter 13 Trustee.